

FILED

OCT 18 2023

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FELICIA BROOKS,

Defendant.

No.

4:23CR555-SRC/JMB

INDICTMENT

COUNT ONE

The Grand Jury further charges that:

On or about August 4, 2022, in the City of St. Louis, within the Eastern District of Missouri,

FELICIA BROOKS,

the defendant herein, then being an employee of the United States Postal Service, did embezzle, steal, abstract or remove an article or thing contained in a letter, postal card, package, bag, or mail entrusted to her and which was intended to be conveyed by mail, and carried and delivered by any carrier or other employee of the Postal Service, and forwarded through and delivered from any post office and station thereof established by authority of the Postmaster General or the Postal Service.

In violation of Title 18, United States Code, Section 1709.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1709 set forth in Count One of this Indictment, the defendant, **FELICIA BROOKS**, shall forfeit

to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2) to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation.

2. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

SAYLER A. FLEMING
United States Attorney

LINDA R. LANE, #AT00114511A
Assistant United States Attorney